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Attorneys for Defendants
 AMAZON.COM, INC.,
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 TWITCH INTERACTIVE, INC.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

B.S.D. CROWN, LTD.,

Plaintiff,

v.

AMAZON.COM, INC.,
 AMAZON WEB SERVICES, INC., and
 TWITCH INTERACTIVE, INC.

Defendant.

Case No. 3:23-cv-00057-WHO

JOINT MOTION TO LIFT STAY

Plaintiff B.S.D. Crown, Ltd. (“BSD” or “Plaintiff”) and Defendants Amazon.com, Inc., Amazon Web Services, Inc., and Twitch Interactive, Inc. (“Amazon” or “Defendants”) jointly move for an order lifting the March 29, 2024, stay pending *ex parte* reexamination (Dkt. No. 109, the “Order”) and setting a case management conference. A proposed Order is attached.

On March 29, 2024, the Court, at Defendants’ request, stayed this patent infringement action pending the results of a third-party *ex parte* reexamination concerning

1 half¹ of the asserted claims of U.S. Patent No. 6,389,473 (the “’473 Patent”)
2 (Reexamination No. 90/015,291). The Court’s Order stayed the case “pending conclusion
3 of the USPTO reexamination process.” Dkt No. 109 at 1.

4 On July 2, 2024, the USPTO concluded the reexamination by confirming the
5 patentability of all of the challenged claims.

6 Although Plaintiff sought to lift the stay based on the reexamination decision, the
7 Court declined the request as Defendants had expressed an intent to file their own request
8 seeking *ex parte* reexamination of the ’473 patent. Dkt No. 116.

9 On August 15, 2024, Defendants filed their request for *ex parte* reexamination
10 (Reexamination No. 90/019,622), which was subsequently ordered and resulted in a
11 February 24, 2025, Office Action rejecting all challenged claims (1, 2, 8-14, 21, 23, and
12 24) of the ’473 patent. On May 27, 2025, Plaintiff filed its Response to the Office Action.
13 Finally, on June 27, 2025, the USPTO issued a Notice of Intent to Issue Ex Parte
14 Reexamination Certificate confirming all challenged claims and terminating Defendants’
15 reexamination. *See* attached Exhibit 1.

16 Plaintiff and Defendants hereby jointly submit that because the reexamination
17 process has concluded, a stay is no longer justified and the Order (Dkt No. 109), by its
18 terms, should be lifted.

28 ¹ Only Asserted Claims 1, 2, 13, 21, and 24 were subject to reexamination. The remaining
Asserted Claims 8, 9, 10, 11, 12, and 14 were unchallenged.

1 Dated: July 3, 2025

VILLEGAS & CEFO LLP

2 By: /s/ Francisco Villegas
3 Francisco A. Villegas

4 Francisco A. Villegas
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8 Attorneys for Plaintiff
9 BSD CROWN, LTD.

10 Dated: July 3, 2025

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19 INTERACTIVE, INC.
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